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10 and for Defendants AEROFLEX INCORPORATED,
11 AEROFLEX COLORADO SPRINGS, INC.,
12 AMI SEMICONDUCTOR, INC.,
13 MATROX ELECTRONIC SYSTEMS, LTD.,
14 MATROX GRAPHICS INC.,
15 MATROX INTERNATIONAL CORP.,
16 and MATROX TECH, INC.

17 UNITED STATES DISTRICT COURT
18 NORTHERN DISTRICT OF CALIFORNIA
19 SAN FRANCISCO DIVISION
20

21 RICOH COMPANY, LTD.,

22 Plaintiff,

23 vs.

24 AEROFLEX INCORPORATED, AMI
25 SEMICONDUCTOR, INC., MATROX
26 ELECTRONIC SYSTEMS LTD., MATROX
27 GRAPHICS INC., MATROX
28 INTERNATIONAL CORP., MATROX TECH,
INC., AND AEROFLEX COLORADO
SPRINGS, INC.

Defendants.

SYNOPSIS, INC.,

Plaintiff,

vs.

RICOH COMPANY, LTD.,

Defendant.

FILED

NOV 22 2005

RICHARD W. WIEKING
CLERK U.S. DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

Case No. C03-04669 MJJ (EMC)

Case No. C03-02289 MJJ (EMC)

**JOINT STIPULATION AND REQUEST TO
MODIFY SECOND AMENDED PRETRIAL
ORDER; [PROPOSED] ORDER
MODIFYING SECOND AMENDED
PRETRIAL ORDER**

JOINT STIPULATION AND REQUEST TO MODIFY SECOND
AMENDED PRETRIAL ORDER; [PROPOSED] ORDER

Case Nos. 03-04669 MJJ (EMC) and 03-02289 MJJ (EMC)
DM_US8277091.v1

1 Ricoh Company, Ltd., Synopsys, Inc. and Defendants Aeroflex, Incorporated, Aeroflex
2 Colorado Springs, Inc., AMI Semiconductor, Inc., Matrox Electronic Systems, Ltd., Matrox Graphics,
3 Inc., Matrox International Corp., and Matrox Tech, Inc. hereby stipulate to proposed schedule, and
4 request that the Court modify its Second Amended Pretrial Order in accordance with the stipulated
5 proposed schedule.

6 On July 13, 2005, the Court conducted a Case Management Conference. During the Case
7 Management Conference, trial setting and scheduling were discussed, and the parties proposed various
8 case schedules. Thereafter, on July 25, 2005, the Court entered a Second Amended Pretrial Order.
9 The Second Amended Pretrial Order sets the trial to commence on July 24, 2006, and sets various
10 pretrial deadlines. Based on the progress of the case to date, the parties file this Stipulation requesting
11 a modification of the Second Amended Pretrial Order.

12 **WHEREAS** discovery in this matter has progressed more slowly than anticipated, with more
13 than 4 million pages of documents being produced by Plaintiff Synopsys, Inc. and Defendants
14 Aeroflex, Incorporated, Aeroflex Colorado Springs, Inc., AMI Semiconductor, Inc., Matrox Electronic
15 Systems, Ltd., Matrox Graphics, Inc., Matrox International Corp., and Matrox Tech, Inc.
16 ("Defendants") since the discovery stay was lifted on July 22, 2005;

17 **WHEREAS** no depositions (other than those relating to the Defendants' 35 U.S.C. § 271(g)
18 motion) have taken place since the discovery stay was lifted;

19 **WHEREAS** the depositions Ricoh intends to take are now scheduled to begin in December and
20 continue through mid-February, and the depositions that Synopsys and Defendants intend to take have
21 not yet been requested or scheduled;

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27 **JOINT STIPULATION AND REQUEST TO MODIFY SECOND 2**
28 **AMENDED PRETRIAL ORDER; [PROPOSED] ORDER**

IT IS HEREBY STIPULATED AND AGREED by and between Ricoh Company, Ltd. and Defendants that the case schedule be changed to the following:

| DATE | DEADLINE/TASK |
|----------------------------|--|
| 3/24/2006 | Final Infringement Contentions due |
| 4/17/2006 | Last day to propound infringement-related discovery |
| 4/24/2006 | Final Invalidity Contentions due |
| 5/30/2006 | Close of fact discovery (responses due by this date) |
| 6/7/2006 | Last day to file discovery motions |
| 6/19/2006 | Opening expert reports due |
| 7/19/2006 | Rebuttal expert reports due |
| 8/18/2006 | Dispositive motions due |
| 8/18/2006 | Close of expert discovery |
| 9/27/2006 <i>9/26/06</i> | Dispositive motion hearing <i>@ 9:30 AM</i> |
| 10/2006 | Settlement conference with Judge Spero |
| 11/13/2006 <i>11/14/06</i> | Pretrial conference <i>@ 3:30 pm</i> |
| 11/27 - 12/15/2006 | Trial <i>@ 8:30 AM</i> |

The parties request that the Court modify its Second Amended Pretrial Order to adopt the dates set forth above, or if the trial date is inconvenient for the Court, such other date as may be convenient for the Court.

Dated: November 16, 2005

HOWREY LLP

By: /s/ Denise M. De Mory _____
Teresa M. Corbin
Denise M. de Mory
Jaclyn C. Fink

Attorneys for Plaintiff SYNOPSYS, INC.
and Defendants AEROFLEX INCORPORATED,
AEROFLEX COLORADO SPRINGS, INC., AMI
SEMICONDUCTOR, INC., MATROX ELECTRONIC
SYSTEMS, LTD., MATROX GRAPHICS INC.,
MATROX INTERNATIONAL CORP. and MATROX
TECH, INC.

1 Dated: November 16, 2005

DICKSTEIN SHAPIRO MORIN & OSHINSKY, LLP

2 By: /s/ Kenneth W. Brothers

Gary Hoffman (*pro hac vice*)

3 Kenneth W. Brothers (*pro hac vice*)

4 Edward M. Meilman (*pro hac vice*)

5 ALTSHULER, BERZON NUSSBAUM, RUBIN &
6 DEMAIN

Jeffrey B. Demain

7 Attorneys for Plaintiff and Defendant
8 RICOH COMPANY, LTD.

9 GOOD CAUSE APPEARING THEREFORE,

10 IT IS HEREBY ORDERED THAT THE SECOND AMENDED PRETRIAL ORDER IS
11 AMENDED TO REFLECT THE SCHEDULE SET FORTH ABOVE.

12
13 By: 

14 Martin L. Jenkins

United States District Court Judge

15 Dated: 11/22, 2005